

UNITED STATES DISTRICT COURT
OF MASSACHUSETTS No. _____

Stanley Donald, Plaintiff,

Vs.

Jeffrey M. Hall, Defendant.

05-11417-WGY

MAGISTRATE JUDGE S. J. OKI

C I V I L R I G H T S C O M P L A I N T

[JURY TRIAL DEMANDED]

Parties:

- 1.] The plaintiff, Stanley L. Donald, resides at P.O. BOX 8000, Shirley, Mass 01464.
- 2.] The defendant, Jeffrey M. Hall, resides at 31 Smith Place, Cambridge, Mass 02138.

Introduction:

- 3.] This is a civil rights complaint, pursuant to 42 U.S.C. § 1983, alleging the defendant, Jeffrey M. Hall, deliberately conspired with State officials to deprive the plaintiff of his constitutional rights under the 5th, 6th, 8th, 14th Amendments, and M.G.L.A. 12 § 11H, 11I.
- 4.] This is a civil rights complaint alleging the defendant breached an agreement under Attorney-Client privileges in violation of the 6th Amendment, and Massachusetts Law.
- 5.] This is a civil rights complaint alleging the defendant acted under Color of Law and allowed racial discrimination to be inflicted upon the plaintiff in the workplace.
- 6.] The plaintiff, Stanley L. Donald, seeks compensatory damages, and punitive damages pursuant to 42 U.S.C. § 1983, and M.G.L.A. 12 § 11H, 11I, for the violations of his civil rights and racial discrimination in the workplace. M.G.L.A. 151B sec. 4.

Jurisdiction:

- 7.]This Court has the jurisdiction to apply the Law under both State and Federal Constitutional Rights pursuant to 42 U.S.C.A. § 1983, 6th 8th Amendments, and 14th Amendment Equal protection of the Law.
- 8.]This Court has the jurisdiction to protect constitutional rights, privileges, and immunities secured by the United States Constitution, and the Commonwealth of Massachusetts.

FACTS:

- 9.]On March 15, 1994, the plaintiff, Stanley Donald, was falsely arrested, and wrongfully indicted for rape and attempt murder by the Cambridge Police and Middlesex District Attorney of Massachusetts. (EXHIBIT "B"-1-to-2)
- 10.]On April 27, 1994, the Middlesex District Attorney dismissed the rape and attempt murder charges in the interest of justice. (EXHIBIT "B"-3-to-4)
- 11.]On about May 5, 1997, the plaintiff obtained employment from the defendant at Educators Publishing Service.
- 12.]While employed at EPS the plaintiff endured racial discrimination from his coworkers and the defendant did nothing to intervene when the defendant was informed of such racial discrimination.
- 13.]The plaintiff's coworkers on several occasions would call him "nigger boy", or "boy", and overload the plaintiff's work area.
- 14.]On one occasion a coworker name "Jeff" knocked over a pallet of boxes and told the plaintiff "nigger boy, you pick up those boxes before lunchtime."
- 15.]While working at EPS the plaintiff also noticed several illegal aliens working in the warehouse of EPS.
- 16.]When the plaintiff told the defendant about the illegal aliens, he the plaintiff was told to mind his own work.

17.]The racial discrimination caused the plaintiff to admit himself into a hospital.

18.]On June 30,1997,the Cambridge Police offered to settle the false arrest lawsuit out of Court with an agreement.(Ex."B"-5to-7)

19.]On June 30,1997, the defendant,Jeffrey M.Hall,who is an attorney provided legal advise and legal representation for the plaintiff on the settlement agreement with the Police.

20.]The defendant signed and notarized the settlement papers for the plaintiff and developed an attorney-client privilege relationship with the plaintiff. (EXHIBIT "B"-8)

21.]On about April 9,1999,the defendant with indifference to the attorney-client relationship testified against the plaintiff in another rape case where the plaintiff is now seeking DNA test to prove his innocence.(EXHIBIT"C")

22.]On January 18,2005, the plaintiff mailed by cerified mail to the defendant a Demand Letter seeking to recover damages he endured as a result of the defendant's unlawful conduct,and violation of his civil rights. (EXHIBITS"A"-"B")

23.]The defendant,Jeffrey M.Hall,failed to meet the Demands and the plaintiff filed this Civil Rights Complaint.

CLAIMS FOR RELIEF:

24.]The plaintiff ,Stanley Donald,suffered dearly as a result of the defendant's deliberate indifference to the racial discrimination imposed upon the plaintiff,causing emotional trauma and mental anguish to be inflicted entitling the plaintiff a claim for relief under 42 U.S.C.§ 1983,and M.G.L.A. 12§11H, and 11I.,M.G.L.A. 151B sec.4.

25.]The plaintiff's attorney-client privilege rights were violated entitling the plaintiff a claim for relief under both State and Federal Laws.

26.]The plaintiff, Stanley Donald, reserves the right to amend this civil rights complaint, and his claims for relief under Fed.Civil R.15.

RELIEF REQUESTED:

Wherefore, the plaintiff, Stanley L. Donald, request the following relief:

- A.)PUNITIVE DAMAGES:Order the defendant to make a charitable donation to the Homeless Empowerment Project of Cambridge for the indifference to the racial discrimination in the amount of \$50,000, Fifty Thousand Dollars.
- B.)COMPENSATORY DAMAGES:Order the defendant to compensate the plaintiff for violating the plaintiff's civil rights, and attorney-client privilege relationship in the amount of \$100,000, One Hundred Thousand Dollars.
- C.)Order the defendant to pay filing fees, costs, and attorney fees.
- D.)Order relief that the Court Deems Justice.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 2nd
,day of JULY, 2005.

Dated: 7/2/2005

Respectfully Submitted
By The Plaintiff,

Stanley L. Donald, pro-se
STANLEY L. DONALD, PRO-SE
ADVOCATE

ENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

JEFFREY M. HALL, ESQ.
PRESIDENT OF
EDUCATORS PUBLISHING CO.
31 SMITH PLACE
CAMBRIDGE, MASS 02138

2. Article Number

(Transfer from service label)

7001-0320-0001-6272-3150

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Charles Davis

☐ Agent☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

Ex. "A"

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

Postage

\$

83

Certified Fee

230

Return Receipt Fee
(Endorsement Required)

1.25

Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees

\$

4.88

Postmark
Here

Sent To

JEFFREY M. HALL, E.P.S.

Street, Apt. No.,
or PO Box No.

31 SMITH PLACE

City, State, ZIP+4

CAMBRIDGE, MASS 02138

PS Form 3800, January 2001

See Reverse for Instructions

CERTIFIED # 7001-0320-0001-6272-3150

Souza-Baranowski Correctional Center Charge Slip

Date: 1/19/2005

Inmate Number:

W66438

Inmate Name:

STANLEY L. DONALD

Amount to be charged: \$

4.88

Payable To:

U.S. postage / DOC

For:

CERTIFIED MAIL RETURN GREEN CARD

Inmate Signature:

Stanley L. Donald

Block:

K-2 (#37)

Approval:

[Signature]

IF SLIP IS \$75.00 OR OVER IT MUST BE COUNTERSIGNED
BELOW. Articles to be purchased MUST be listed on BACK.

Approval: IPS

Check #:

JAN 19 2005

Date:

58-121

051E 2229 1000 0200 1001

LEGAL MAIL TO JEFFREY M. HALL, ESQ.

Jeffrey M.Hall, Esq.
President of
Educators Publishing Service
31 Smith Place
Cambridge, Mass 02138
Tel: (617) 547-6706

Ex. B

RE: Violation of Attorney - Client Privilege Rights

[DEMAND LETTER]

Dear Mr.Hall:

- This is a demand letter according to Law. As reasons;
- 1.] On March 15, 1994, Stanley Donald was falsely arrested, and wrongfully indicted for attempt murder, and attempt rape by the Cambridge Police Department, and Middlesex District Attorney. See (Attachments #1-to-#2)
 - 2.] On April 27, 1994, the Middlesex District Attorney Nolle Prosequi the indictments in the interests of Justice. See (Attachments #3-to-#4)
 - 3.] On June 30, 1997, the Cambridge Police Department acknowledged the false arrest against Stanley Donald through an out of Court settlement agreement. See (Attachments #5-to-#7)
 - 4.] On June 30, 1997, Stanley Donald obtained legal advise, and legal representation from Jeffrey Hall, Esq., to the false arrest and wrongful indictment.
 - 5.] On June 30, 1997, Jeffrey Hall, Esq., signed and notarized a civil action settlement claim for Stanley Donald which constituted an attorney-client privilege relationship under Massachusetts Law. See (Attachment #8)
 - 6.] On about April 9, 1999, Jeffrey Hall, Esq., severely with indifference violated the attorney-client relationship by testifying, in a criminal rape case against Stanley Donald, as an officer for the Middlesex District Attorney.

THEREFORE, Stanley Donald respectfully demands compensation for the violation of his attorney-client privilege rights in the amount of (\$25,000) Twentyfive Thousand Dollars.

Thank you for your cooperation.

Sincerely, Stanley L. Donald
Stanley L. Donald, Advocate

TO: Donald, Legal, File.

Page 1 of 2

Cambridge Police Department Supplemental Report				Number	
1S. Org. Case Invest. <input type="checkbox"/>	City Solicitor <input type="checkbox"/>	2S. Date of Occurrence	M	3S. Date of Report	
Arr. Incident Report <input type="checkbox"/>	Sudden Death <input type="checkbox"/>				
Follow Up Invest. <input checked="" type="checkbox"/>	Child in Custody <input type="checkbox"/>	M	D	Y	T
5S. Business/Complainant's Name					
Detective					
Address					
5 Western Ave., Cambridge, MA 02139					
6S. Date in Court		7S. Judge		8S. Court	
				9S. Disposition	
Block#					
<p>the head and the next thing the knew she was being forced to the driveway behind 847 Mass Avenue. At this time, reports that the sp. repeatedly bashed her head, face down into the snow telling her " Don't say a word or I'll kill you"! Sp kept bashing her head to the point where felt like she was going to die. As laid there on the ground face down, the sp forced her pants down half way and kept yelling "Don't move". The victim at this time tried to reach for a can of mace in her left front pocket. The sp then said "What are you doing"? He then punched the victim in the face again grabbing her by the neck. At this time, the suspect fled on Clinton Street towards Harvard Street.</p>					
10S. Status of Case					
Cleared <input type="checkbox"/> Suspend <input type="checkbox"/> Arrest <input type="checkbox"/> Comp / Wkr <input type="checkbox"/> Hearing <input type="checkbox"/> Unfound <input type="checkbox"/> Station Adj <input type="checkbox"/> Other <input type="checkbox"/> Continued Inv <input type="checkbox"/>					
11S. Property Recovered					
Yes <input type="checkbox"/> No <input type="checkbox"/>					
Total Value					
12S. Juvenile Card Made					
Yes <input type="checkbox"/> No <input type="checkbox"/>					
13S. Narcotic Number					
14S. Narcotic / Alcohol Sheet Made					
Yes <input type="checkbox"/> No <input type="checkbox"/>					
15S. Technical Work					
Yes No					
Photo <input type="checkbox"/> <input type="checkbox"/>					
Finger Print <input type="checkbox"/> <input type="checkbox"/>					
Composite <input type="checkbox"/> <input type="checkbox"/>					
Other <input type="checkbox"/> <input type="checkbox"/>					
By Whom					
16S. Victim/Comp. Cont.					
In Person <input type="checkbox"/>					
Letter <input type="checkbox"/>					
Phone <input type="checkbox"/>					
Call Card <input type="checkbox"/>					
17S. Photo Viewed					
Yes <input type="checkbox"/> No <input type="checkbox"/>					
18S. Citation No.					
19S. Time Expended					
Investigation					
Original Reporting Off.					
20S. Reporting Officer's Signature					
21S. Reviewing Officer's Signature					
Date					

#3

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

CAMBRIDGE DISTRICT COURT
NO. 94-0785

COMMONWEALTH

v.

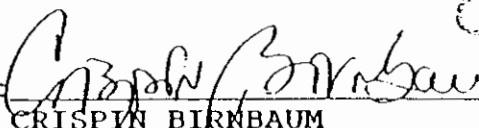
STANLEY DONALD

NOLLE PROSEQUI

Now comes the Commonwealth and hereby files a nolle prosequi in the interests of justice. As reasons therefore, the Commonwealth states that the defendant participated in a lineup on April 1, 1994 with the advice of counsel. The victim failed to choose the defendant from the lineup. The Commonwealth has indicted a different individual for the underlying assault, that individual having been chosen from the lineup by the victim.

Respectfully Submitted
For the Commonwealth,
THOMAS F. REILLY
DISTRICT ATTORNEY

by:


CRISPIN BIRNBAUM

Assistant District Attorney
Middlesex Superior Courthouse
40 Thorndike Street
Cambridge, MA 02141
(617) 494-4085

April 27, 1994
0144t



#

DOCKET

9452 CR 0785

COURT DIVISION CAMBRIDGE		NAME, ADDRESS AND ZIP CODE OF DEFENDANT <i>Indy.</i> Stanley Denard Donald Stanley 86 Howard Ave. Roxbury, MA		ATTORNEY NAME <input type="checkbox"/> Waived <input type="checkbox"/> Retained <input checked="" type="checkbox"/> Assigned <i>COS</i>		APR 07 2000 #4	
027 52 3472				TERMS OF RELEASE <i>250,000 cash</i> DATE		PROCEEDING <i>Cont'd.</i>	
DEF. DOB AND SEX 6/6/62 b/m		OFFENSE CODE(S) 614 636		3-16-94		<input type="checkbox"/> Arraigned before J. <input checked="" type="checkbox"/> Advised of right to counsel <input type="checkbox"/> Advised of right to drug exam <input checked="" type="checkbox"/> Advised of right to bail review <input type="checkbox"/> Advised of right to F.I. Jury Trial <input type="checkbox"/> Waives <input type="checkbox"/> Requests F.I. Jury Trial <input type="checkbox"/> Advised of alien rights <input type="checkbox"/> Warrant issued <input type="checkbox"/> Default warrant issued <input type="checkbox"/> Default removed <input checked="" type="checkbox"/> Warrant recalled <input type="checkbox"/> Warrant issued <input type="checkbox"/> Default warrant issued <input type="checkbox"/> Default removed <input type="checkbox"/> Warrant recalled	
DATE OF OFFENSE 3/2/94		PLACE OF OFFENSE Cambridge		3-16-94			
COMPLAINANT Bill Phillips, Jr.		POLICE DEPARTMENT (if applicable) Cambridge					
DATE OF COMPLAINT 3/11/94		RETURN DATE AND TIME Warrant					
COUNT-OFFENSE a. ASSAULT WITH INTENT TO MURDER c265 a15				FINE		SURFINE	
				COSTS		TOTAL DUE	
DATE		PLEA <input type="checkbox"/> Not Guilty <input type="checkbox"/> Guilty <input type="checkbox"/> Nolo <input type="checkbox"/> New Plea: <input type="checkbox"/> Admits suff. facts		IMPRISONMENT AND OTHER DISPOSITION			
FINDING		JUDGE		NOLE PROSECUTION ENTERED. STATEMENT OF REASONS FILED.			
4-28-94		<i>Waller Thig</i>		FINAL DISPOSITION <input type="checkbox"/> Discharged from probation <input type="checkbox"/> Dismissed at request of probation			
		<input type="checkbox"/> Cont. w/o finding until: <input type="checkbox"/> Appeal of find. & disp. <input type="checkbox"/> Appeal of disp.		DATE			
COUNT-OFFENSE b. ASSAULT WITH INTENT TO RAPE c265 a24				FINE		SURFINE	
				COSTS		TOTAL DUE	
DATE		PLEA <input type="checkbox"/> Not Guilty <input type="checkbox"/> Guilty <input type="checkbox"/> Nolo <input type="checkbox"/> New Plea: <input type="checkbox"/> Admits suff. facts		IMPRISONMENT AND OTHER DISPOSITION			
FINDING		JUDGE		NOLE PROSECUTION ENTERED. STATEMENT OF REASONS FILED.			
4-28-94		<i>Waller Thig</i>		FINAL DISPOSITION <input type="checkbox"/> Discharged from probation <input type="checkbox"/> Dismissed at request of probation			
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COUNT-OFFENSE				FINE		SURFINE	
				COSTS		TOTAL DUE	
DATE		PLEA <input type="checkbox"/> Not Guilty <input type="checkbox"/> Guilty <input type="checkbox"/> Nolo <input type="checkbox"/> New Plea: <input type="checkbox"/> Admits suff. facts		IMPRISONMENT AND OTHER DISPOSITION			
FINDING		JUDGE		BAIL RETURNED TO SURETY 04/04/94 #09134007 BAIL 200.00			
		<input type="checkbox"/> Cont. w/o finding until: <input type="checkbox"/> Appeal of find. & disp. <input type="checkbox"/> Appeal of disp.		FINAL DISPOSITION <input type="checkbox"/> Discharged from probation <input type="checkbox"/> Dismissed at request of probation			
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COUNT-OFFENSE				FINE		SURFINE	
				COSTS		TOTAL DUE	
DATE		PLEA <input type="checkbox"/> Not Guilty <input type="checkbox"/> Guilty <input type="checkbox"/> Nolo <input type="checkbox"/> New Plea: <input type="checkbox"/> Admits suff. facts		IMPRISONMENT AND OTHER DISPOSITION			
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				DATE			
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6/06		(The ...)		6/06		(The ...)	
7/06		(The ...)		7/06		(The ...)	
8/06		(The ...)		8/06		(The ...)	
9/06		(The ...)		9/06		(The ...)	
10/06		(The ...)		10/06		(The ...)	
11/06		(The ...)		11/06		(The ...)	
12/06		(The ...)		12/06		(The ...)	
1/07		(The ...)		1/07		(The ...)	
2/07		(The ...)		2/07		(The ...)	
3/07		(The ...)		3/07		(The ...)	
4/07		(The ...)		4/07		(The ...)	
5/07		(The ...)		5/07		(The ...)	
6/07		(The ...)		6/07		(The ...)	
7/07		(The ...)		7/07		(The ...)	
8/07		(The ...)		8/07		(The ...)	
9/07		(The ...)		9/07		(The ...)	
10/07		(The ...)		10/07		(The ...)	
11/07		(The ...)		11/07		(The ...)	
12/07		(The ...)		12/07		(The ...)	
1/08		(The ...)		1/08		(The ...)	
2/08		(The ...)		2/08		(The ...)	
3/08		(The ...)		3/08		(The ...)	
4/08		(The ...)		4/08		(The ...)	
5/08		(The ...)		5/08		(The ...)	
6/08		(The ...)		6/08		(The ...)	
7/08		(The ...)		7/08		(The ...)	
8/08		(The ...)		8/08		(The ...)	
9/08		(The ...)		9/08		(The ...)	
10/08		(The ...)		10/08		(The ...)	
11/08		(The ...)		11/08		(The ...)	
12/08							

Sch 3 7/11/97

#5

GENERAL RELEASE
AND
INDEMNIFICATION AGREEMENT
IN SETTLEMENT OF CLAIM

For and in consideration of the sum of Eight Hundred Dollars (\$800.00) paid to me by the City of Cambridge, the sufficiency and receipt of which is hereby acknowledged, I, Stanley L. Donald, of 5 Norwell Street, #3, Dorchester, Massachusetts 02121, do hereby, on behalf of myself, my children, assignees, successors, heirs, grantees, attorneys and agents (hereinafter the "Releasor") hereby remise, release and forever discharge the City of Cambridge, the Cambridge Police Department and William H. Phillips, Jr., their employees, agents, attorneys, officials and residents (hereinafter the "Releasees") and each of them from all debts, demands, actions, causes of action, judgments, sums of money, liabilities and any and all claims of every kind, nature and description whatsoever, both in law and equity, or otherwise which the Releasor now has, ever has had or ever could have against the Releasees, from the beginning of the world and through this date, including but not limited to all claims, allegations, assertions, and/or demands which were asserted or could have been asserted by the Releasor in the case of Stanley L. Donald v. City of Cambridge, et al., Middlesex County Superior Court Department Civil Action No.

94-04001D. The Releasor expressly acknowledges that this is a General Release and Indemnification Agreement of all outstanding and potential claims against the Releasees.

Stanley Donald expressly warrants, covenants and agrees that (1) he shall never communicate or attempt to communicate with Luz

#6

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Clarke either in person, by telephone, in writing or otherwise, either directly or indirectly or through someone else; and (2) he shall forever stay at least fifty yards from Luz Clarke; and (3) he shall never harm, threaten or attempt to harm Luz Clarke.

Stanley Donald expressly warrants, covenants and agrees that (1) he shall never communicate or attempt to communicate with Marilyn Viruet either in person, by telephone, in writing or otherwise, either directly or indirectly or through someone else; and (2) he shall forever stay at least fifty yards from Marilyn Viruet; and (3) he shall never harm, threaten or attempt to harm Marilyn Viruet.

The Releasor expressly acknowledges that he is releasing the Releasees and each of them from all claims, whether known or unknown; that the Releasor has not been induced by any representations by the Releasees or each of them or others to enter into this release; the Releasor does so of his own free will; and that this release will remain in effect notwithstanding the discovery or existence of any additional fact or any facts different from those which the Releasor now knows or believes to be true.

It is further understood and agreed that Releasor shall not, directly or indirectly, take or initiate, authorize or assent to, or voluntarily cooperate with or assist in any way any third party or parties which may take or initiate, any action or actions of any nature whatsoever, which would derogate in any way from the effect of this General Release and Indemnification Agreement. Releasor

#8

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COMMONWEALTH OF MASSACHUSETTS

Suffolk, ss.

June 30, 1997

Then appeared before me the above-named Stanley L. Donald to me known, who made oath the execution of the within General Release and Indemnification Agreement in Settlement Claim is his free act and deed and that he understood and agreed to its terms.


Notary Public

My commission expires: Feb 21, 2003

COMMONWEALTH OF MASSACHUSETTS

#9

MIDDLESEX.ss

SUPERIOR COURT
CIVIL ACTION

NO.#MICV96-04001D

STANLEY DONALD(PLAINTIFF)

vs

WILLIAM H. PHILLIPS, JR(DEFENDANT)
CAMBRIDGE POLICE DEPARTMENT

COMPLAINT

PARTIES

- 1) PLAINTIFF STANLEY DONALD RESIDES AT CAMBRIDGE JAIL, 40- THORNDIKE ST
CAMBRIDGE, MASS 02141 COUNTY OF MIDDLESEX.
- 2) DEFENDANT WILLIAM H. PHILLIPS, JR RESIDES AT 5 WESTERN AVE, CAMBRIDGE, MA 02136
COUNTY OF MIDDLESEX.

FACTS

- 3) ON ABOUT MARCH 11, 1994 THE PLAINTIFF WAS ARRESTED BY THE CAMBRIDGE POLICE FOR ATTEMPT MURDER, ATTEMPT RAPE, THE DEFENDANT REQUESTED A WARRANT FOR THE PLAINTIFF TO BE ARRESTED, THE PLAINTIFF WAS ARRESTED IN FRONT OF THE PUBLIC AND THROWN IN A POLICE WAGON IN THE MIDDLE OF THE STREET IN HARVARD SQ, THE PLAINTIFF WAS HELD AT THE POLICE STATION AND THEN TRANSFERED TO CAMBRIDGE DISTRICT COURT, AND HELD AT THE CAMBRIDGE JAIL FOR THREE WEEKS ON A FIFTY THOUSAND DOLLARS BAIL AND THE PLAINTIFF REPEATLY ASK THE DEFENDANT TO HAVE THE VICTIM TO (I.D) HIM, THE DEFENDANT DID NOT COMPLY TO THE PLAINTIFF REQUEST
- 4) ON ABOUT APRIL 1, 1994 THE PLAINTIFF REQUESTED TO PUBLIC COUNSEL TO HAVE HIM PLACED IN A LINEUP, AND UPON THIS LINEUP THE VICTIM DID NOT PICK THE PLAINTIFF TO BE THE ONE THAT ASSULTED HER, AND THE VICTIM PICK A DIFFERENT INDIVIDUAL FROM THE LINEUP, AND THAT INDIVIDUAL WAS INDICTED FOR THE ASSULT AND SENTENC TO PRISON FOR THE ASSULT.
- 5) ON APRIL 1, 1994 THE DEFENDANT NEVER REQUESTED TO THE COURT TO RELEASE THE PLAINTIFF, SO THE COURT HELD THE PLAINTIFF ON A TWO HUNDER DOLLARS BAIL AND THE COURT HAD NO REASON TO HOLD THE PLAINTIFF ANY LONGER ON BAIL, AND WHEN THE PLAINTIFF FINALLY MADE BAIL, THE PLAINTIFF WAS FIRED FROM HIS PART TIME JOB AT HARVARD UNIVERSITY, AND EVICTED FROM HIS PLACE OF RESIDENTS AND FORCE TO LIVE ON THE STREET AS A HOMELESS PERSON.

WEREFOR THE PLAINTIFF REQUEST THIS HONORABLE COURT:

- A) REQUEST THE DEFENDANT TO COMPENSATE THE PLAINTIFF FOR WASTED TIME IN JAIL
- B) ORDER THE DEFENDANT TO MAKE SUITABLE PAYMENT FOR PERSONAL PROPERTIES LOST BY THE PLAINTIFF.
- C) REQUEST THE DEFENDANT TO PAY A SETTLEMENT FOR EMOTIONAL STRESS CAUSE TO PLAINTIFF.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

Stanley D. Donald 6/30/96

Ex. "C"

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

SUPERIOR COURT
No. MICR97-2366-001 - 006

COMMONWEALTH

v.

STANLEY DONALD

Def's. HABEAS CORPUS FOR HEARING

Now comes the defendant, Stanley Donald, in the above-entitled matter and requests this Honorable Court to issue a Habeas Corpus to direct the Superintendent, Lois Russo, or those acting in her capacity at the Souza-Baranowski Corr. Ctr. to produce the defendant before this Court for a hearing on the pending pleadings; and Motion for DNA test and inspection of rape documents.

Dated: JUNE 3rd/2005

Respectfully Submitted
By Defendant Himself,

Stanley L. Donald
Stanley L. Donald, (Def.)
S.B.C.C. #W66438
P.O. BOX 8000
Shirley, Mass 01464

**Commonwealth of Massachusetts
County of Middlesex
The Superior Court**

Ex. "C"

CRIMINAL DOCKET# MICR1997-02366

RE: **Commonwealth v Donald, Stanley**

TO: Stanley L Donald W66438
SBCC
PO Box 8000
Shirley, MA 01464

CLERK'S NOTICE

This is to notify you that in the above referenced case the Court's action on 06/13/2005 is as follows:

Deft files Habeas corpus for hearing

Motion (P#232) Denied without prejudice, pending Commonwealth's response to defendant's pending DNA Motions (Lauriat, J)

Dated at Cambridge, Massachusetts this 14th day of June, 2005.

Edward J. Sullivan,
Clerk of the Courts

Location: Rm 10B (Cambridge)

Disabled individuals who need handicap accommodations should contact the Administrative Office of the Superior Court at (617) 788-8130

JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

STANLEY DONALD, Box 8000,
Shirley, Mass 01464

DEFENDANTS

JEFFREY M. HALL

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

Worcester

(c) Attorney's (Firm Name, Address, and Telephone Number)

STANLEY DONALD, pro-se, P.O. Box 8000,
Shirley, Mass 01464-8000

Attorneys (If Known)

JEFFREY M. HALL, Esq.
31 Smith Place,
Cambridge, Mass 02138

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

☐ 1 U.S. Government
Plaintiff

☒ 3 Federal Question
(U.S. Government Not a Party)

☐ 2 U.S. Government
Defendant

☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

V. ORIGIN

(Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1983.

Brief description of cause: RACIAL Discrimination/Violation of Client Agreement.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

150,000

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

JUNE 28, 2005

SIGNATURE OF ATTORNEY OF RECORD

Stanley L. Donald, PRO-SE PLAINTIFF

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) Civil Rights Complaint
STANLEY DONALD VS. JEFFREY M. HALL

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

- ☐ I. 160, 410, 470, 535, R.23, REGARDLESS OF NATURE OF SUIT.
- ☒ II. 195, 196, 368, 400, 440, 441-446, 540, 550, 555, 625, 710, 720, 730, *Also complete AO 120 or AO 121 for patent, trademark or copyright cases
740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950.
- ☐ III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371, 380, 385, 450, 891.
- ☐ IV. 220, 422, 423, 430, 460, 480, 490, 510, 530, 610, 620, 630, 640, 650, 660, 690, 810, 861-865, 870, 871, 875, 900.
- ☐ V. 150, 152, 153.

05-11417WGY

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

-NONE-

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?

YES ☐ NO ☒

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES ☐ NO ☒

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES ☐ NO ☐

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES ☐ NO ☒

7. Do all of the parties in this action, excluding governmental agencies of the united states and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).

YES ☒ NO ☐

A. If yes, in which division do all of the non-governmental parties reside?

Eastern Division ☒ Central Division ☐ Western Division ☐

B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division ☐ Central Division ☐ Western Division ☐

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES ☐ NO ☒

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME STANLEY L. DONALD, PRO-SE PLAINTIFFADDRESS SBCC, P.O. BOX 8000, SHIRLEY, MASS 01464TELEPHONE NO. (home) • (617) 822-0035, IF NECESSARY.